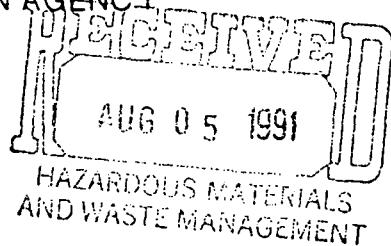




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2405



Ref: 8HWM-FF

AUG 1 1991

Frazer Lockhart
Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, Colorado 80402-0928

RE: Revised Phase III RFI/RI Workplan
Operable Unit 1, 881 Hillside.

Dear Mr. Lockhart,

EPA has reviewed the revised Phase III RFI/RI Workplan and Quality Assurance Addendum for Operable Unit (OU 1), 881 Hillside, submitted April 5, 1991, and the Environmental Evaluation Plan for OU 1 submitted June 7, 1991. EPA is very concerned that some key conditions of EPA's December, 1990, conditional approval were not fully satisfied. Specifically, these are:

- extension of soil scrape samples within OU 1, especially within IHSS 130;
- evaluation of contaminant particle size for risk assessments and
- sampling for NAPLs. *no aqueous phase*

Additionally, the investigation must assure the following:

- adequate air monitoring is in place for a complete evaluation of the air pathway in the risk assessment and environmental evaluation;
- ARARs are evaluated as presented in the attached comments; and
- controls against laboratory contamination are in place and that previous data showing elevated concentrations of potential laboratory contaminants is verified. Contamination not attributable to laboratory contamination must be considered as contamination from a waste source.

These concerns are summarized in the general comments and presented in more detail in the attached comments.

EPA feels strongly that these changes to the workplan are

ADMIN RECORD

A-OU01-000659


necessary for allowance of data collection and interpretation to complete an approvable RFI/RI report. Neglecting the comments may result in an unacceptable RFI/RI report and subsequent assessment of penalties under the Interagency Agreement (IAG).

It is EPA's position that outside of the above concerns, the Phase III RFI/RI Workplan, Quality Assurance Addendum and Environmental Evaluation Plan are adequate to commence OU 1 field activities. EPA approves the workplan with the exception of the stated areas of concern. The areas outlined must be submitted for EPA and CDH approval through technical memoranda by August 23, 1991.

Additionally, DOE is proposing changes to the analyte list as described in this workplan. Until EPA formally approves any changes to the analyte list, the analyte list defined in the April, 1991 submittal must be followed.

OU 1 is designated as a joint EPA and CDH lead site under the IAG. The workplan must be approved by both EPA and CDH. This letter transmits only EPA's qualified approval. We expect CDH to transmit its comments separately. If you or members of your staff have questions regarding the attached comments, please contact Patricia Corbetta at (303) 294-1071.

Sincerely,

A handwritten signature in dark ink, appearing to read "M. C. Fraser (for)".

Martin Hestmark, Manager
Rocky Flats Project

enclosure

cc: Patricia Corbetta, EPA
Peter Ornstein, EPA
✓ Gary Baughman, CDH
Noreen Matsuura, CDH
Barbara Barry, RFP
Tom Olsen, DOE
Jim Koffer, EG&G
Cindy Gee, EG&G
Terry Smith, PRC